

B&V WASTE SCIENCE AND TECHNOLOGY CORP.

A Black & Veatch Company

101 North Wacker Drive, Suite 1100, Chicago, Illinois 60606, (312) 346-3775, Fax: (312) 346-4781

EPA Region 5 Records Ctr.



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COPY

USEPA/SSI-3
Perma-Treat of Illinois, Inc.

BVWST Project 71130
BVWST File C.4
April 29, 1993

Mr. Rudy J. Bond, Owner
Perma-Treat of Illinois, Inc.
P.O. Box 99
Marion, Illinois 62959

Subject: Perma-Treat of Illinois, Inc.
North Carbon Street and Industrial
Park Drive, Marion, Illinois 62959
CERCLIS ID No. ILD 063 698 971

Dear Mr. Bond:

B&V Waste Science and Technology Corp. (BVWST) has been retained by the U.S. Environmental Protection Agency (USEPA) under contract 68-W8-0064 for the purpose of evaluating candidate sites for the National Priorities List (NPL) under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) and the Superfund Amendments and Reauthorization Act (SARA).

We have obtained information on this site from the files of the USEPA. The Illinois Environmental Protection Agency has documented a 1988 release of chromated copper arsenate from the site to an adjacent ditch, and eventually to West Creek. This release resulted in the site being added to the Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS). This listing makes the site a candidate for the NPL. BVWST has been authorized to make a screening site inspection (SSI) on this site.

This inspection will occur in two phases. The first phase will be a reconnaissance over the property by two BVWST scientists/engineers. This reconnaissance will require no more than a work day to complete. As a part of the reconnaissance, BVWST is required by the USEPA to interview the person(s) having knowledge of past activities at this site which may have resulted in release of regulated hazardous substances into the environment. We will be contacting you by telephone soon to arrange a time for this reconnaissance and interview.

The second phase entails another visit by BVWST scientists/engineers to obtain samples of the hazardous substances, if any, in the site environment. The attached Explanation of Sampling Conditions relates the particular conditions USEPA mandates for this visit. After the reconnaissance, we will call to schedule the sampling visit.

The USEPA Work Assignment instructs BVWST to examine all of the site and sample as needed but not to enter buildings unless permitted by the owner/operator. A possible exception to this non-entry policy is the need to quickly reach a telephone to summon emergency assistance. BVWST is also tasked to photograph onsite conditions.

We request that you or the person(s) being interviewed at the time of the reconnaissance have available to the BVWST personnel a plat, drawing, or sketch showing the boundaries of your ownership at this site. This information will aid the team to inspect all of the site without trespassing on adjoining properties inadvertently. We appreciate your cooperation in this matter.


To assure site owners/operators of the legitimacy of our requests, USEPA Region V has prepared a Letter of Introduction for BVWST employees engaged in site inspection work. The letter includes an explanation of the statutory basis for such inspections. I enclose a copy of the Letter of Introduction so that you may better understand the importance of this work.

BVWST field inspectors will work during the reconnaissance from a worksheet and we enclose a copy to give you advance knowledge of the type of information we seek. We request that the person(s) you designate to be interviewed during the reconnaissance visit be prepared to provide this information.

If you have any questions concerning the matters in this letter, please call John Chitwood or me at (312) 346-3775 between the hours of 8:00 a.m. and 5:00 p.m., Monday through Friday.

Sincerely,

B&V WASTE SCIENCE AND TECHNOLOGY CORP.

A handwritten signature in cursive script, reading "Richard M. McAvoy".

Richard M. McAvoy
Project Manager

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Explanation of Sampling Conditions For a Screening Site Inspection

The second onsite phase of a Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS) screening site inspection is the sampling visit. The B&V Waste Science and Technology Corp. (BVWST) sampling team needs approximately two days at your site to sample soil and/or water to be analyzed for the chemical compounds and metals regulated by U.S. Environmental Protection Agency (USEPA) under Comprehensive Environmental Response Compensation and Liability Act. The site owner receives a copy of the final Screening Site Inspection Report, which contains analytical results of site samples taken by the BVWST team. If you want portions of any samples taken by BVWST, we are responsible to provide them under the following conditions:

1. You supply your own sample containers, which must meet the USEPA Region V Analytical Operations Branch specifications. Write them at 77 West Jackson Boulevard, Chicago, Illinois 60604 for the specifications. In addition, you supply the iced coolers to transport the samples to your chosen laboratory for analysis.
2. Cost of analysis by your chosen laboratory must be paid by you.

During sampling, small quantities of excess soil and/or water are produced as well as small quantities of rinse water and detergent solution from sampling equipment decontamination. USEPA instructs us to return all produced soil and/or water to its point of origin and return the sampled area to original condition as much as possible. The rinse water will be poured into the suspected contaminated areas, as it is greatly reduced in contaminant concentration. The detergent solution will likewise be poured into the suspected contaminated areas, as the detergent used is biodegradable. In the unlikely event that the BVWST team must use a solvent to complete the decontamination of sampling equipment, this material must be stored temporarily on site in secure containers (which BVWST provides) until transport of these materials by a licensed hazardous waste hauler under proper manifesting is arranged to either a licensed treatment or disposal facility.

We send two Sampling Conditions Explanation copies. Please provide the information indicated below, sign one copy and give it to the BVWST Team Leader at the time of the reconnaissance and interview. Thank you for your cooperation.

As owner / operator (mark out inappropriate term) of the Perma-Treat of Illinois, Inc., CERCLIS ID No. ILD 063 698 971:

1. I want / do not want (mark out inappropriate term) a separate suite of samples taken by the BVWST Team, and
2. I agree to the temporary holding, if deemed necessary by BVWST, on the site of materials produced by the sampling procedures until their removal by a licensed hazardous waste hauler.

Signed _____

Name printed _____

Title _____

Date _____

SC-3/SSI G4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

LETTER OF INTRODUCTION

This is to certify that the employees of B & V Waste Science and Technology Corp., whose signatures, photographs, and physical descriptions are attached are duly designated contract employees of the U.S. Environmental Protection Agency (EPA). It is requested that, upon presentation of this letter, those selected to work on your site be allowed pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. subsection 9604(e), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), Pub. L. 99-499, 100 Stat. 1613 (1986), to enter at all reasonable times any vessel, facility, establishment, or other place or property:

- a. where any hazardous substance or pollutant or contaminant may be or has been generated, stored, treated, disposed of, or transported from; or
- b. from which or to which a hazardous substance or pollutant or contaminant has been or may have been released; or
- c. from which or to which a release of hazardous substance or pollutant or contaminant is or may be threatened; or
- d. where entry is needed:
 - 1. to determine the need for a response; or
 - 2. to determine the appropriate response; or
 - 3. to effectuate a response action; or
 - 4. to monitor an ongoing response.

It is requested that, upon presentation of this letter, the designated BVSWT employees be allowed pursuant to Section 104(e) of SARA to inspect and/or obtain samples from any location of any suspected hazardous substance or pollutant or contaminant. A receipt for any samples taken will be provided, if requested, at the conclusion of the inspection. Upon your request, a portion of each sample will be provided to you to analyze independently at your expense.

It is requested that, upon presentation of this letter, the designated BVWST employees be furnished pursuant to Section 104(e) of SARA information from any person or documents relating to:

- a. the identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility or transported to a vessel or facility; or
- b. the nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility; and
- c. the ability of a person to pay for or perform a cleanup.

In addition, upon reasonable notice, you shall:

- a. grant these employees access at all reasonable times to any vessel, facility, establishment, place, property, or location to inspect and copy all documents or records relating to the above-mentioned matters; or
- b. copy and furnish to these employees all requested documents or records, at your expense.

Information requested pursuant to Section 104 of SARA must be provided to EPA notwithstanding its characterization as confidential or containing trade secrets. Provisions for managing and protecting confidential information are contained in 40 CFR Part 2. Accordingly, please identify any information which you consider to be privileged or confidential so that EPA and its agents may take appropriate protective measures.

However, pursuant to Section 104(e)(7)(E) of SARA, you may not claim that information is entitled to protection as confidential unless you show each of the following:

- (i) you have not disclosed the information to any other person, other than a member of a local emergency planning committee established under Title III of SARA, an officer or employee of the United States or a state or local government, your employee, or a person who is bound by a confidentiality agreement, and such person has taken reasonable measures to protect the confidentiality of such information and intends to continue to take such measures; and
- (ii) the information is not required to be disclosed, or otherwise made available, to the public under any other federal or state law; and
- (iii) disclosure of the information is likely to cause substantial harm to your competitive position; and

(iv) the specific chemical identity, if sought to be protected, is not readily discoverable through reverse engineering.

The following information with respect to any hazardous substance at the facility or vessel shall not be entitled to protection as confidential:

(i) the trade name, common name, or generic class or category of the hazardous substance;

(ii) the physical properties of the substance, including its boiling point, melting point, flash point, specific gravity, vapor density, solubility in water, and vapor pressure at 20 degrees Celsius;

(iii) the hazards to health and the environment posed by the substance, including physical hazards (such as explosion) and potential acute and chronic health hazards;

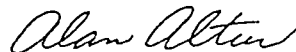
(iv) the potential routes of human exposure to the substance at the facility, establishment, place or property being investigated, entered, inspected or sampled;

(v) the location of disposal of any waste stream;

(vi) any monitoring data or analysis of monitoring data pertaining to disposal activities;

(vii) any hydrogeologic or geologic data;

(viii) any groundwater monitoring data.



Alan Altur
Work Assignment Manager
Illinois Site Inspections
Site Assessment Section
(312) 886-0390

SITE RECONNAISSANCE WORKSHEET
ILLINOIS SCREENING SITE INSPECTIONS

1.0 SITE OWNERSHIP/OPERATOR

- 1.1. Who owns site (name, address, telephone number)?
- 1.2. Who is presently working there (name, address, telephone number)?
- 1.3. What is identity of site (physical location, street address, distance from local landmarks, etc.)?
- 1.4. Name and title of O/O representative(s) spoken to:
- 1.5. If site is not occupied, who locally can grant access (name, address, telephone number, and relationship to O/O)?

2.0 PRESENCE OF CERLA REGULATED SUBSTANCES

- 2.1. What CERLA regulated substances have been used at the site in the past? In what way?
- 2.2. Are any CERLA regulated substances being used at present? In what way?
- 2.3. Does site have a RCRA number?
- 2.4. Have there been any releases reported to EPA or State for this site?
- 2.5. Is site presently being monitored for any reason? Why and how?
- 2.6. Does O/O have any analytical information for the site? Will O/O provide a copy of it to BVST?

3.0 SITE CHARACTERISTICS

3.1 ACCESSIBILITY

3.1.1 Condition of perimeter of work area or property boundaries

- 3.1.1.1 Are there barriers to access to property from outside? Describe them.
- 3.1.1.2 If only parts of the property have barriers, locate this area in relation to whole property.
- 3.1.1.3 Locate access points to property (driveways, gates, etc.) Note those which will allow vehicular access.
- 3.1.2 Are there natural barriers? Describe them.

3.2 STRUCTURES

- 3.2.1 Describe briefly the number and type(s) of buildings on the site.
- 3.2.2 Describe briefly other types of structures on the site.
 - Utilities (power lines, gas lines, water lines, etc.)
 - Storage (tanks, bins, silos, etc.)
 - Containment (dams, berms, ditches, etc.)
 - Disposal (dry wells, waste pits, waste piles, lagoons, etc.)

NOTE: Sketch major structures on the sketch map or obtain property map from O/O showing them.

3.3 TRANSPORTATION FACILITIES

- 3.3.1 Locate on map the driveways and parking lots that are paved. Indicate nature of paving.
- 3.3.2 Locate on map all areas where vehicular traffic has used unpaved areas. Indicate nature of surface.
- 3.3.3 Are there railroad tracks on property? Determine what is shipped in/out now? in past? Who owns tracks and right-of-way?

3.4 TOPOGRAPHY

- 3.4.1 Depressions
 - 3.4.1.1 Are there any depressions on the property?
 - 3.4.1.2 Are they natural or developed?
 - 3.4.1.3 Do any contain fluids? What does O/O say it is?
 - 3.4.1.4 Have any contained fluids in the past? What were they?
- 3.4.2 Elevated areas
 - 3.4.2.1 Are there any elevated areas on the property?
 - 3.4.2.2 Are they natural or developed?
 - 3.4.2.3 What are they composed of?
 - 3.4.2.4 If developed, when were they built and with what materials?
- 3.4.3 Surface Drainage
 - 3.4.3.1 Indicate on sketch map general direction(s) of surface drainage.
 - 3.4.3.2 Which seem natural in nature?
 - 3.4.3.3 Which are artificial? What areas do they drain?
 - 3.4.3.3 Are there any water table indicators at the surface?
 - 3.4.3.3.1 Wetlands
 - 3.4.3.3.2 Springs or seeps
 - 3.4.3.3.3 Ponds (natural)
 - 3.4.3.3.4 Perennial streams

3.5 LAND USE

- 3.5.1 What is general type of land use on site?
- 3.5.2 What is land use of adjacent properties?
- 3.5.3 Is there any land use that could promote migration of CERLA regulated substances, if present?

3.6 POTENTIAL FOR HAZARDOUS WASTE OCCURRENCE

- 3.6.1 Are there presently on site any manufactured containers which now contain or may have contained CERLA regulated substances? Describe and locate each one or group. Indicate type of container, material made of, condition, markings or labels, size
- 3.6.2 Are there any structures which suggest the previous existence of such manufactured containers? Describe.
- 3.6.3 Are there developed surface features that may contain hazardous wastes? Describe. Such things as trash piles, dumps, pits, lagoons, sumps, etc. should be examined.

- 3.6.4 Is there other evidence that may point to presence of hazardous wastes? Such things as bare ground, discolored or stained soil, ground emitting odors, encrustations, charred areas, etc. should be sought and described.

4.0 HEALTH AND SAFETY INFORMATION

- 4.1 Determine what facilities of the site, if any, can be used by BVWST workers when on site. Inquire about such things as
- potable water source
 - tap water hookup (for hosing during decon)
 - on-site telephone accessible during emergency
 - fire fighting equipment
 - trash containers (for disposing non-hazardous waste)
 - Toilets
- 4.2 Get telephone numbers for the local
- Police/Sheriff
 - Fire Dept.
 - Hospital
 - Ambulance
- 4.3 Determine shortest/quickest route from site to nearest hospital.
- 4.4 Determine locations of the two nearest accessible telephones. If either of these are pay phones, check each before going to the site to be assured it is currently working. Determine coinage needed to make call and have this amount in a designated place during entire time on site.
- 4.5 Inquire if there is any reason O/O objects to use of radio communication by BVWST workers during sampling visit.